UNITED STATES OF AMERICA

BEFORE THE NATIONAL LABOR RELATIONS BOARD

REGION 20, SUBREGION 37

HTH CORPORATION, PACIFIC BEACH CORPORATION, and KOA MANAGEMENT, LLC, a SINGLE EMPLOYER, d/b/a PACIFIC BEACH HOTEL and))))))))))		37-CA-7311 37-CA-7334 37-CA-7422 37-CA-7448 37-CA-7458 37-CA-7476 37-CA-7478 37-CA-7482 37-CA-7484 37-CA-7488 37-CA-7537 37-CA-7550 37-CA-7550
HTH CORPORATION d/b/a PACIFIC BEACH HOTEL,))		
and)	CASE	37-CA-7470
KOA MANAGEMENT, LLC d/b/a PACIFIC BEACH HOTEL)		
and))	CASE	37-CA-7472
PACIFIC BEACH CORPORATION d/b/a PACIFIC BEACH HOTEL)		
and))	CASE	37-CA-7473
INTERNATIONAL LONGSHORE AND WAREHOUSE UNION, LOCAL 142)		

INTERNATIONAL LONGSHORE AND WAREHOUSE UNION, LOCAL 142's REQUEST FOR PERMISSION TO EXCEED THE PAGE LIMIT FOR ANSWERING BRIEF TO EXCEPTIONS AND REQUEST FOR PERMISSION TO EXCEED THE PAGE LIMIT FOR SUPPORTING BRIEF FOR CROSS-EXCEPTIONS

Charging party, International Longshore Warehouse Union, Local 142 (ILWU) respectfully requests permission to exceed the page limit set forth in Section 102.46(j) of the Board's Rules and Regulations. On October 28, 2009, Respondents filed their Exceptions and Brief in Support of Exceptions that contain multiple allegations and raises numerous issues to which ILWU must respond. deadline for ILWU to file an answering brief to Respondents' Exceptions is November 12, 2009. Respondents' Exceptions and Brief in Support of Exceptions raises numerous challenges to the Administrative Law Judge's rulings and decision from the underlying hearing which spanned 13 days and resulted in a voluminous record of over 2,300 pages of transcript and numerous exhibits. Due to the number of multiple allegations and complex issues, and voluminous record, Counsel for the ILWU's Brief to the Administrative Law Judge consisted of approximately 155 pages. Based on the foregoing, Counsel for the ILWU anticipates that an Answering Brief to Respondents' Exceptions will require it to exceed the Board's page limitations. Accordingly, ILWU respectfully permission to submit an Answering Brief to Respondents' Exceptions not to exceed 100 pages.

Further, the ILWU still needs to determine whether it will file cross exemptions to a portion of the Administrative Law Judge James M. Kennedy's decision in the instant case. The deadline for ILWU to file Cross-Exceptions and a brief in support of Cross-Exceptions is November 12,

2009. For the reasons set forth above, Counsel for ILWU also respectfully requests permission to submit a brief in support of Cross-Exceptions not to exceed 100 pages.

Dated: Honolulu, Hawaii, November 3, 200/9

HERBERT R. TAKAHASHI DANNY J. VASCONCELLOS

REBECCA L. COVERT

Attorneys for Charging Party International Longshore And Warehouse

Union, Local 142

CERTIFICATE OF SERVICE

The undersigned hereby certifies that one copy of the International Longshore And Warehouse Union, Local 142's Request For Permission To Exceed The Page Limit For Answering Brief To Exceptions And Request For Permission To Exceed The Page Limit For Supporting Brief For Cross-Exceptions has this day been served by electronic mail and by regular U.S. Mail, postage prepaid, upon the following persons at their last-known addresses:

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Dated: Honolulu, Hawaii, November 3, 2009

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